(OLSF 8.1 V)



Reply To Attn Of: HW-113

January 24, 1991

Dean Fowler, Project Manager Utilities Division Spokane County Public Works N. 811 Jefferson Street Spokane, Washington 99201-0180

RE: Comments: Quality Assurance and Field Sampling Plan

Dear Mr. Fowler:

The U.S. Environmental Protection Agency (EPA) has reviewed the document, "Quality Assurance and Field Sampling Plan, Colbert Residential Well Sampling," dated October 1990. The review identified a number of general and specific comments which are included below or attached. Preparation of this document begins to more clearly define the program.

General Comments

This Quality Assurance and Field Sampling Plan (QASP) is only part of the overall project management plan for the Residential Well Sampling program. The overall management plan for the program will list the goals and objectives of the program and will discuss how the QASP is integrated into it. The project management plan is the document that will provide the criteria for which wells are sampled and the rational for the developing the criteria.

The Colbert Landfill Consent Decree refers to this program as the "Domestic Well Monitoring Program." The terms should be cross referenced and stated that this sampling and monitoring program is a requirement of the consent decree and that the QASP is being developed under the program for the purposes of modifying the program that is currently in place.



Specific Comments

A number of specific comments are attached. Some of the comments may be repeated in this section, but this only refers to different sources rather than special emphasis.

Quality Assurance Plan

- 1.0. The consent decree refers to this as the "Domestic Well Monitoring Program."
- 1.1 page QA-1-2. The U.S. Air Force (McChord AFB) was also a party to the negotiations and is a part of the final settlement, although not a signatory to the decree.
- 1.2. Although this program may designed to "evaluate the progress of the Remedial Action," its primary purpose is to protect the public health by checking the quality of residential drinking water.
- 4.1. Were the wells selected based on contaminant plumes? The residential wells were initially used to find the plume and to test domestic wells for potability.
 - 4.2. Does the Table QA-4-1 represent a procedure?

Field Sampling Plan

4.2. The purging system is written for wells with no pumps in them. Most of the residential wells that are being sampled are in service and have existing pumps in them. The concept of purging a domestic well for protection of public health needs to be developed. Most residents use water from their taps almost immediately after turning them on.

Figure QA-2-1. This figure may need to be updated to reflect some changes in personnel.

We realize some of the difficulties developing changes to an ongoing program. We are looking forward to the final proposal for the changes that the County feels will improve the Domestic Well Monitoring Program.

Sincerely,

Neil E. Thompson Project Manager

Enclosures

cc: Mike Kuntz, Ecology